

1 UNITED STATES DISTRICT COURT  
2  
3 NORTHERN DISTRICT OF CALIFORNIA  
4

5 TVIIM, LLC, a Colorado  
6 Limited liability company, Case No. 3:13-  
7 cv-04545-VC

8 Plaintiff,  
9 v.

10  
11 MCAFEE, INC., a corporation,  
12 Defendant.

13  
14  
15 CONFIDENTIAL - OUTSIDE ATTORNEYS EYES ONLY  
16  
17

18 This is the videotaped deposition of YANNICK YU,  
19 held at the Alt Hotel, Toronto Pearson, 6080  
20 Viscount Road, Mississauga, Ontario, Canada on  
21 Tuesday, October 28, 2014 at 10:06 a.m.

22  
23  
24 Reported by:  
25 Nancy Lowrey, CSR, RPR

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1 record at 12:50 p.m.

2 --- Lunch break at 12:50 p.m.

3 --- Upon resuming at 1:35 p.m.

4 THE VIDEOGRAPHER: Going back on  
5 the record at 1:36 p.m.

6 BY MR. SHAEFFER:

7 Q. Good afternoon, Mr. Yu. Do  
8 you recall you're still under oath?

9 A. Yes.

10 EXHIBIT NO. 5: Document entitled  
11 "Proposed Design for McAfee  
12 Vulnerability Scanner, Bates  
13 reference 84901 DOC 031031 to  
14 1040".

15 BY MR. SHAEFFER:

16 Q. I would like to hand you what  
17 I've marked as Exhibit 5, which is entitled  
18 "Proposed Design for McAfee Vulnerability Scanner,  
19 84901DOC031031 to 1040". Ask you to take a look  
20 at that. Is this a document you prepared?

21 A. Yes.

22 Q. And you prepared it as your  
23 ordinary course of business?

24 A. Yes.

25 Q. The first version, version

1                   0.1, is dated December 2nd, 2010. Does that  
2                   refresh your recollection as to when you began  
3                   working on a Vulnerability Scanner?

4                   A. It doesn't, but the time stamp  
5                   doesn't lie, so I believe that's when it happened.

6                   Q. So it would have been shortly  
7                   around that period of time. Were you working on  
8                   it a year before you did this draft or would it  
9                   have been a couple months, couple weeks?

10                  A. As I recall, around that time  
11                  when we started to put this document together as  
12                  the first version is when we started to really  
13                  work on it. Shortly after we started working on  
14                  this document.

15                  Q. And do you recall -- now  
16                  taking a look at this document, do you recall  
17                  anything else, other than what you testified to,  
18                  about how the idea to pursue a  
19                  Vulnerability Scanner came about at McAfee for the  
20                  consumer products?

21                  MS. PRESCOTT: Do you want him to  
22                  read through the whole document?

23                  BY MR. SHAEFFER:

24                  Q. I'm going to have you look at  
25                  portions of the document, but just having seen

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1 I declare under penalty of perjury  
2 under the laws that the foregoing is  
3 true and correct.

4  
5 Executed on January 29th, 2015,  
6 at MISSISSAUGA, ONTARIO, CANADA.

g sw

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12 WITNESS SIGNATURE

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